

EXHIBIT D

In the Matter Of:
DIAZ vs TESLA, INC.

3:17-CV-06748-WHO

OWEN ORAPIO DIAZ, JR.

June 21, 2019

VOLUME III



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1 people that you took instruction from was Robert. 09:43:30

2 Is this the same Robert you are mentioning 09:43:34

3 now? 09:43:36

4 A Yes, sir. 09:43:38

5 Q Okay. Last time your deposition was taken, 09:43:39

6 you couldn't recall Robert's last name. 09:43:41

7 Do you know it now? 09:43:43

8 A No, sir. 09:43:46

9 Q Do you know who employed Robert? 09:43:50

10 A Tesla. 09:43:55

11 Q Do you know what Robert's position was? 09:43:57

12 A I believe it was a lead. 09:44:02

13 Q And what department did he work? 09:44:06

14 A Conveyance. 09:44:12

15 Q And you testified previously that Robert, I 09:44:20

16 believe, also called you the N-word. 09:44:25

17 Is this the same Robert? 09:44:28

18 A Yes, sir. 09:44:30

19 Q Okay. And you understand when I'm referring 09:44:30

20 to the N-word? 09:44:32

21 A Yes, sir. 09:44:33

22 Q Okay. How did you come to the conclusion 09:44:39

23 that Robert was employed by Tesla? 09:44:42

24 A The role that he provided for the company, 09:44:52

25 the fact that he mentioned it a few times and never 09:44:58

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1 STATE OF CALIFORNIA)
2) SS:
3 CITY AND COUNTY OF SAN FRANCISCO)
4

5 I, Michael Cundy, CSR NO. 12271, a
6 Certified Shorthand Reporter of the State of
7 California, do hereby certify:

8 That the foregoing proceedings were
9 taken before me at the time and place herein set
10 forth; that any witnesses in the foregoing
11 proceedings, prior to testifying, were placed under
12 oath; that a verbatim record of the proceedings was
13 made by me using machine shorthand which was
14 thereafter transcribed under my direction; further,
15 that the foregoing is an accurate transcription
16 thereof.

17 I further certify that I am neither
18 financially interested in the action nor a relative or
19 employee of any attorney or any of the parties.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22 Dated: July 3, 2019



24 Michael Cundy, CSR NO. 12271
25

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